

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Southern District of Florida



United States of America

v.

KEANDRE JAVAN MILLER

Case No.

24-mj-6061-AOV

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of February 8, 2024 in the county of Broward in the
Southern District of Florida, the defendant(s) violated:

Code Section
18 U.S.C. Section 2252(a)(1)
18 U.S.C. Section 2252(a)(4)(B)

Offense Description
Transportation of Child Pornography
Possession of Child Pornography

This criminal complaint is based on these facts:
See Attached Affidavit

☒ Continued on the attached sheet.

Complainant's signature

Jerome Long, S/A HSI

Printed name and title

Sworn to before me and signed in my presence.

Date: 02/09/2024

City and state: Fort Lauderdale, Florida

Judge's signature

Hon. Alicia O. Valle, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Jerome Long, being first duly sworn, hereby depose and state as follows:

INTRODUCTION

1. This affidavit is being submitted in support of a criminal complaint which charges **Keandre Javan MILLER** with a violation of Title 18, United States Code, Sections 2252(a)(1) (transportation of child pornography) and 2252(a)(4)(B) (possession of child pornography).

2. I am employed as a Special Agent with the Department of Homeland Security (DHS), Homeland Security Investigations (HSI). Prior to joining HSI, I was a Federal Air Marshal with the United States Transportation Security Administration, Federal Air Marshals Service (FAMS). Prior to joining FAMS, I was a United States Customs and Border Protection Officer. In my current capacity as an HSI Special Agent, I am assigned to the Special Victims Group (SVG) and am responsible for conducting child exploitation investigations. Specifically, I investigate crimes relating to the sexual exploitation of children, including but not limited to the enticement and attempted enticement of a minor to engage in sexual criminal activity, as well as the production, transportation, distribution, receipt, and possession of child pornography, in violation of Title 18, United States Code, Sections 2422(b), 2251, 2252, and 2252A. I have conducted and/or assisted in child exploitation investigations and received training in how to conduct such investigations. As a part of my duties, I have observed and reviewed numerous examples of child pornography, as defined in Title 18, United States Code, Section 2256, in all forms of media, including computer media. I am familiar with the tactics used by individuals who collect and distribute child pornographic material.

3. I submit this Affidavit based on information known to me personally from the investigation, as well as information obtained from others who have investigated the matter or have personal knowledge of the facts herein. Because this Affidavit is being submitted for the limited

purpose of establishing probable cause for the requested warrant, it does not include every fact known to me about this matter.

PROBABLE CAUSE

4. On or about February 8, 2024, Keandre Javan MILLER, a United States citizen, arrived at the Fort Lauderdale-Hollywood International Airport (FLL), on JetBlue Airways Flight Number 40, from Medellin, Colombia. United States Customs and Border Protection (“CBP”) officers referred MILLER to passport control secondary for further processing and examination of his purpose of travel.

5. During the secondary examination, MILLER advised that he traveled to Colombia for vacation. MILLER was in possession of an iPhone 13 among other personal items. CBP officers conducted a cursory search of MILLER’s iPhone 13 after MILLER provided the passwords for the devices. During their inspection, CBP officers discovered numerous photographs and videos of naked, underage girls engaged in sexual activity. CBP officers subsequently contacted your affiant, who responded to FLL to conduct further investigation.

6. At FLL, your affiant and CBP officers conducted a further review of MILLER’s iPhone 13. During this review, law enforcement discovered multiple images and videos depicting pre-pubescent and pubescent children engaged in sexual acts, to include the following:

- A one minute, forty-four second video, that depicts a naked adult male aggressively picking up a six- to eight-year-old girl, turning her around and penetrating her anus in multiple positions.
- A one minute, fifty second video, that depicts a naked adult man slapping a 10- to 12-year-old girl followed by aggressively forcing the girls head to perform oral sex, the video continues with the adult male slapping her buttocks and aggressively engaging in vaginal penetration with the girl.

- A 47 second video depicting a 12- to 14-year-old girl performing oral sex on an adult male.
- A two minute, one second video of a six- to eight-year-old girl performing oral sex on an adult male, the adult male proceeds to touch her vagina, and the girl starts to masturbate in front of the adult male.

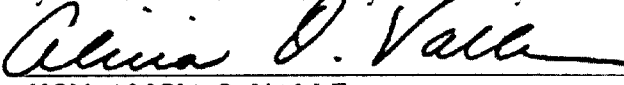
CONCLUSION

Based on the aforementioned facts, I respectfully submit that there is probable cause to support the arrest of **Keandre Javan MILLER** for committing a violation of Title 18, United States Code, Sections 2252(a)(1) (transportation of child pornography) and 2252(a)(4)(B) (possession of child pornography).

FURTHER YOUR AFFIANT SAYETH NAUGHT.


SPECIAL AGENT JEROME LONG
HOMELAND SECURITY INVESTIGATIONS

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1
by FACETIME on this 9th day of February, 2024.


HON. ALICIA O. VALLE
UNITED STATES MAGISTRATE JUDGE

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NUMBER: 24-mj-6061-AOV

BOND RECOMMENDATION

DEFENDANT: KEANDRE JAVAN MILLER

Pre-Trial Detention

(Personal Surety) (Corporate Surety) (Cash) (Pre-Trial Detention)

By: _____
AUSA: Joseph A. Cooley

Last Known Address: _____

What Facility: Broward County Jail

Agent(s): HSI S/A Jerome Long
(FBI) (SECRET SERVICE) (DEA) (IRS) (ICE) (**OTHER**)